

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION**

UNITED STATES OF AMERICA
for the use and benefit of
TOTAL ENVIRONMENTAL CONCEPTS, INC.,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,

Defendant.

Case No: 2:20-cv-03992-EAS

**Judge Edmund A. Sargus, Jr.
Magistrate Judge Jolson**

JOINT MOTION TO STAY

Plaintiff Total Environmental Concepts, Inc. and Defendant Federal Insurance Company (collectively, the “Parties”) hereby jointly request that this Court stay this case for sixty (60) days, up to and including January 11, 2021, to provide the Parties time to engage in good faith settlement negotiations. In the event the Parties do not reach settlement, counsel for Plaintiff will notify the Court by or before January 11, 2021.

Respectfully Submitted,

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